284E Power House
200 East Area
Asbestos "Left in Place" Notification

This notification has been developed In accordance with the DOE/RL-2010-33, *Removal Action Work Plan for Central Plateau General Decommissioning Activities*, Section 2.2.2.1, "Removal of Hazardous Substances," Page 2-2, which requires notification be provided to U.S. Environmental Protection Agency (EPA) prior to implementation of emission controls similar to those addressed by EPA/600/R-08/094, *Comparison of Alternative Asbestos Control Method and the NESHAP Method for Demolition of Asbestos-Containing Buildings*. The notification provides an estimate of the potential asbestos-containing material (ACM) that will remain in place prior to demolition and the planned asbestos control methods for such ACM.

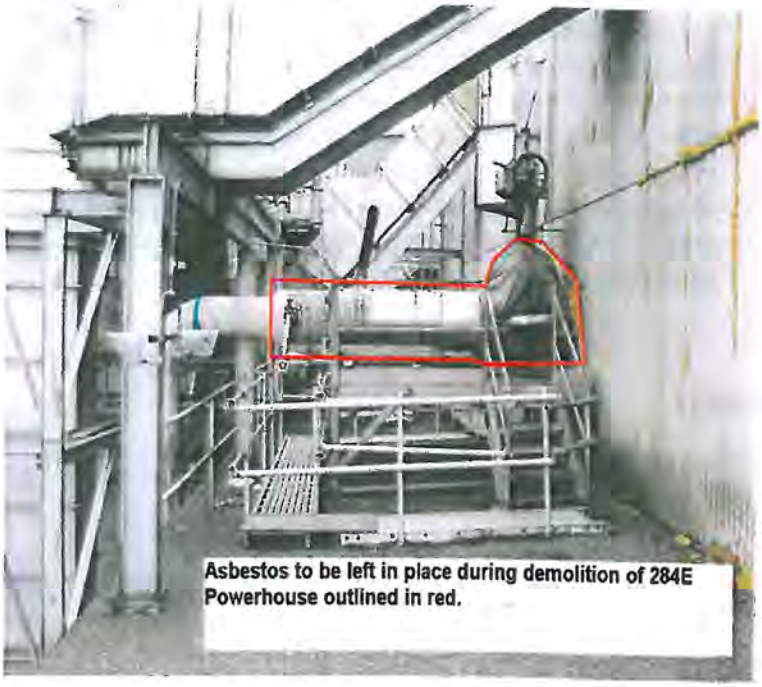
Asbestos to be "Left in Place" During Demolition of 284E Power House

The 200 East D&D Project for Central Plateau General Decommissioning will be demolishing the 284E Power House in the 200 East Area. The D&D Project is planning to demolish the Power House with inaccessible Class I Thermal System Insulation (TSI) asbestos containing material (ACM) left in place.

The inaccessible Class I TSI ACM is located on a section of roof of 284E Building Powerhouse. The roof area is not accessible, due to safety concerns that the roof may not be safe for occupancy.

The photo to the right shows the area where the Class I TSI ACM is located. The TSI material is wrapped in metal sheeting. The pipe location is on the east side of the building. The pipe is approximately 18 inches in diameter (circumference 4.7 ft) and approximately 12 feet long (~56 ft^2).

A large valve may also be covered with Class I TSI ACM. The valve is covered by a heavy removable thermal cover. Best conservative estimates of surface area on the valve are approximately 25 ft^2.



Asbestos to be left in place during demolition of 284E Powerhouse outlined in red.

Total square footage of approximately 81ft^2. Using the approximately total square footage and an insulation depth of approximately 2 inches (0.167 feet), the total cubic feet of Class I TSI ACM is approximately 13.5 ft^3.

The asbestos areas of concern were inspected by a qualified asbestos inspector. The inspector determined that asbestos being left in place for demolition is Class I TSI ACM. Workers have removed the Class I TSI ACM from ground level to the roof access point.

The project contends that the remaining areas of asbestos, identified in this report are inaccessible and removal would pose a risk to workers. The project plans to wrap the area and/or apply as much fixative as necessary to all the exposed areas of the inaccessible asbestos to reduce asbestos fibers from becoming airborne.

During the demolition of the structure and upon reaching the inaccessible piping, the Project will attempt to remove the pipe section and place it on the ground where the asbestos can be abated using the standard methods applied during prior asbestos removal or wrapped and placed in a waste container and for disposal. Removal during the demolition phase will be determined by Project Management based on worker safety for accessibility.

Controls to be implemented for demolition of structures/buildings that contain Class I TSI and/or Class II regulated ACM (RACM) that will remain in place during demolition will be the controls listed in DOE/RL-2010-33, Section 2.2.2.1, Pages 2-2 and 2-3 (which are provided below).

1. An accredited asbestos building inspector will perform a comprehensive inspection of the building/structure to be demolished.
2. An estimate of the potential ACM that may reside in the building or structure [is provided].
3. A competent person trained in asbestos regulations will provide oversight during active asbestos demolition activities.
4. Track hoes, end loaders, and equivalent equipment and control explosives may be used during demolition in conjunction with wetting processes to minimize generation of dust.
5. Building/structures to be demolished with RACM remaining will be thoroughly and adequately wetted with amended water (water to which a surfactant has been added) prior to demolition, during demolition and during debris handling and loading. To the extent feasible, cavity areas and interstitial wall spaces will be wetted. A fixative or sealant such as "lockdown" may be used to reduce the potential for fiber and dust generation during the demolition process. Additionally, fixative or sealant will be used on demolition debris that will remain undisturbed for greater than 24 hours.
6. Breakage of ACM will be minimized, to the extent practical, and ACM debris generated during that day will be containerized for disposal.
7. The "National Emission Standards for Hazardous Air Pollutants" (NESHAPs) asbestos standard of "no visible emissions" from RACM or ACM will be employed.
8. In the event of inclement weather that will impede the ability to adequately wet the structure, demolition activities will be delayed or halted.
9. Worker protection requirements will be followed. Personal protective equipment (PPE) will either be disposed of as RACM or decontaminated in accordance with Occupational Safety and Health Administration (OSHA) practices.
10. Potentially contaminated water will be controlled during demolition. Impervious surfaces will be thoroughly washed with water following completion of the asbestos-related activities.
11. Upon the removal of demolition debris, bare soil within the asbestos-related demolition area will be excavated to a minimum depth of 7.62 cm (3 in.) or until no debris is found. If berms or other run-off controls were used to contain water, they will be removed and imposed of as potentially asbestos-contaminated.

These controls are in addition to those standard demolition controls listed in Section 4.3.4 of DOE/RL-2010-33.